

ATTACHMENT 1

2007.05.18 11:14:02
Kansas Corporation Commission
/s/ Susan K. Duffy

In the Matter of the Application of a Review of the Commission's)
Federal USF Certification Requirement to Remove All Expenses)
and Investments by Competitive Eligible Telecommunications)
Carriers in a Southwestern Bell Telephone, L.P., Study Area from)
the Competitive Eligible Telecommunications Carrier's)
Justification of Use of High Cost Federal Support.)

Docket No. 07-GIMT-498-GIT

STATE CORPORATION COMMISSION

MAY 18 2007

 Docket
Room

Rebuttal Testimony

Prepared By

Janet Buchanan

On Behalf Of

Kansas Corporation Commission Staff

1 **Q Please state your name and business address.**

2 A My name is Janet Buchanan. My business address is: Kansas Corporation
3 Commission, 1500 S.W. Arrowhead Rd., Topeka, Kansas 66604-4027.

4

5 **Q Are you the same Janet Buchanan that provided direct testimony on May 4,**
6 **2007?**

7 A Yes.

8

9 **Q What is the purpose of your rebuttal testimony?**

10 A I will respond to arguments made in direct testimony by Mr. Steve Mowery on
11 behalf of ALLTEL Kansas Limited Partnership ("ALLTEL"), Mr. Chris Frentrop
12 on behalf of Sprint Nextel Corporation ("Sprint"), and Mr. Don J. Wood on behalf
13 of USCOC of Nebraska/Kansas LLC and RCC Minnesota, Inc. ("USCOC/RCC").
14 I begin by reiterating a brief background of the impetus for the federal universal
15 service fund ("USF") because it is important to examine the arguments of
16 ALLTEL, Sprint and USCOC/RCC in this context. I will then address issues
17 common to the testimony of all three witnesses. Finally, I address a few issues
18 raised by each witness individually.

19

20 **USF Background**

21 **Q Why did the Congress and the Federal Communications Commission**
22 **("FCC") find that explicit support was necessary in a competitive**
23 **environment?**

1 A Universal service has been a longstanding goal in the regulation of
2 telecommunications. Prior to the Federal Telecommunications Act of 1996
3 ("FTA"), this goal was achieved by implicit subsidization of high cost services.
4 Implicit subsidies within the rate structures of incumbent carriers enabled the
5 carriers to provide service to high cost customers at rates that were below cost.
6 For instance, the rates paid by urban customers were greater than the cost of
7 serving in urban areas; business customers paid rates higher than the cost of
8 serving them; and, access charges were higher than the cost of providing access.
9 It was believed that implicit subsidies within the incumbent carrier's rates would
10 not be sustainable in a competitive market and universal service would be at risk.
11 Specifically, the FCC stated that,

12 [i]mplicit subsidies were sustainable in a monopoly
13 environment because some consumers (such as urban
14 business customers) could be charged rates for local
15 exchange and exchange access service that significantly
16 exceeded the cost of providing service, and the rates paid
17 by those consumers would implicitly subsidize service
18 provided by the same carrier to others. By adoption of the
19 1996 Act, Congress has provided for the development of
20 competition in all telephone markets. In a competitive
21 market, a carrier that attempts to charge rates significantly
22 above cost to a class of customers will lose many of those
23 customers to a competitor. This incentive to entry by
24 competitors in the lowest cost, highest profit market
25 segments means that today's pillars of implicit subsidies –
26 high access charges, high prices for business services, and
27 the averaging of rates over broad geographic areas – will be
28 under attack. New competitors can target service to more
29 profitable customers without having to build into their rates
30 the types of cross-subsidies that have been required of
31 existing carriers who serve all customers.¹
32

¹ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, released May 8, 1997, paragraph 17. (*Report and Order*)

1 The initial concern of regulators was that incumbent carriers would not be able to
2 compete in markets for their lower cost service without eroding the support for
3 the high cost services. Thus, implicit support was replaced with explicit support
4 through the USF. Once support was made explicit, it was determined that USF
5 support should be portable to competitive carriers in a competitively neutral
6 manner. This was done to address concerns that explicit support would create a
7 barrier to entry in high cost areas. The FCC stated that,

8 . . . competitively neutral rules will ensure that [] disparities
9 are minimized so that no entity receives an unfair
10 competitive advantage that may skew the marketplace or
11 inhibit competition by limiting the available quantity of
12 services or restricting the entry of potential service
13 providers.²
14

15 Competitively neutral porting of support would allow all carriers to “. . . receive
16 comparable support for performing comparable functions.”³ The FCC believed
17 that explicit support mechanisms would encourage competitive carriers to serve in
18 areas other than the lower cost urban areas.

19
20 **Q Was providing an incentive for competitive entry the FCC’s primary**
21 **concern?**

22 **A** It appears that the FCC’s primary concern was to preserve and advance universal
23 service. As explained above, in order to preserve universal service, subsidies had
24 to be made explicit because competition for lower cost services would eliminate
25 the subsidy implicit in the incumbent provider’s rates. The FCC then recognized

² *Id.* Paragraph 48.

³ *Id.* Paragraph 144.

1 that explicit subsidies received by only the incumbent carrier would deter
2 competition in higher cost markets. As with implicit subsidies, explicit subsidies
3 could interfere with efficient market outcomes. Therefore, to encourage
4 competitors to enter markets when economically rational to do so, the FCC made
5 USF support portable on a competitively neutral basis. However, in making high
6 cost support available, the primary concern has been preserving and advancing
7 universal service. In its December 2006 Monitoring Report the Federal-State
8 Joint Board states that,

9 [t]he high-cost support mechanisms enable areas with very
10 high costs to recover some of these costs from the federal
11 universal service fund, leaving a smaller remainder of the
12 costs to be recovered through end-user rates or state
13 universal service support mechanisms. In this manner, the
14 high-cost support mechanisms are intended to hold down
15 rates and thereby further one of the most important goals of
16 federal and state regulation – the preservation and
17 advancement of universal telephone service.⁴
18

19 **Interstate Access Support**

20 **Q Mr. Mowery and Mr. Wood make reference to a particular type of high-cost**
21 **support in their testimony. (See pages 4-6 and page 18, respectively.) What**
22 **is interstate access support (“IAS”)?**

23 **A** IAS was established by the FCC on May 31, 2000.⁵ The support was designed to
24 provide price-cap carriers with a replacement for the implicit support the carriers
25 received through interstate access charges that were reduced through the CALLS
26 plan. The purpose of this support, along with Long-term Support (“LTS”) and
27 Interstate Common Line Support (“ICLS”) is to ensure affordable interstate rates

⁴ Federal-State Joint Board, December 2006 Monitoring Report, released December 2006, p. 3-1.

⁵ *Id.* Page 3-7.

1 rather than intrastate rates.⁶ Support is targeted to the higher-cost areas and is
2 portable.

3
4 **Q Mr. Mowery and Mr. Wood state that AT&T receives IAS in Kansas. Do**
5 **you agree?**

6 A Yes. According to the Universal Service Administrative Company's web site,
7 Southwestern Bell Telephone Company, L.P. (now AT&T) received \$493,353 of
8 IAS.

9
10 **Q Do ALLTEL, Sprint, RCC and USCOC receive IAS?**

11 A Yes. See Rebuttal Exhibit JB-1. IAS is ported to these carriers on a per-line basis
12 in the service areas AT&T and Embarq.

13
14 **Q Is the Commission required to certify that IAS is used for its intended**
15 **purpose?**

16 A No. Eligible Telecommunications Carriers ("ETCs") provide certification
17 directly to the FCC.

18
19 **Q On page 18 of his testimony, Mr. Wood contends that the Commission's**
20 **current certification procedures and forms prohibit a competitive ETC from**
21 **spending IAS in AT&T service areas or in any area. Is this accurate?**

22 A No. The Commission's current certification procedures and forms do not address
23 the use of IAS because carriers must certify directly to the FCC that they have

⁶ *Id.* Page 3-8.

1 used such support for its intended purpose. The current procedures and forms do
2 not require the competitive ETC to report either the amount of IAS received or the
3 manner in which the IAS was utilized. Competitive ETCs are free to use IAS in a
4 manner consistent with their certification to the FCC.

5
6 **Q Mr. Mowery, at page 6 of his testimony, asserts that AT&T's receipt of IAS**
7 **is evidence that AT&T serves high-cost areas. Do you agree?**

8 **A** As I stated in my direct testimony, many areas served by incumbent and
9 competitive ETCs would be considered rural by most measures. Those rural areas
10 are likely to be more costly to serve than more urban areas of the state. However,
11 this question diverts focus from the real issue at hand.

12
13 **Q What is the appropriate focus?**

14 **A** The question before the Commission is whether a carrier should be permitted to
15 expend high-cost USF support in an area for which no support is available to
16 carriers as determined by the FCC. Other than IAS, no federal support is
17 available for providing service in AT&T's service areas. The FCC's high-cost
18 model does not substantiate a need for AT&T to receive high-cost model support.
19 Since AT&T does not receive high-cost model support, there is no support ported
20 to a competitive ETC for serving lines in AT&T's service area.

21
22 While it may be true that portions of AT&T's service area appear to be higher in
23 cost than others, a carrier cannot be permitted to misallocate the high-cost support

1 it receives for serving other incumbent ETC service areas to provide service in
2 AT&T's service area. As discussed in direct testimony, this would violate the
3 principle of competitive neutrality and would not be in the public interest. If
4 AT&T and/or the competitive ETCs believe that the FCC's high-cost model does
5 not accurately reflect the cost of providing service in AT&T's Kansas service
6 area, then the appropriate response is to petition the FCC for modification to the
7 model.

8
9 **Demonstrations of the High Cost Nature of AT&T's Service Area**

10 **Q Along with the receipt of IAS, Mr. Mowery (at pages 7, 12-13), Mr. Wood (at**
11 **pages 10, 13-14) and Mr. Frentrup (at page 7) argue that the population**
12 **densities in AT&T's service area indicate that there are high-cost areas. Do**
13 **you agree?**

14 **A** As I stated above, many areas served by incumbent and competitive ETCs would
15 be considered rural by most measures. Those rural areas are likely to be more
16 costly to serve than more urban areas of the state. Staff has performed density
17 analysis in ETC designation proceedings when redefinition of a rural carrier's
18 service area is requested and as part of a review of the public interest of granting a
19 request for ETC designation. Rebuttal Exhibit JB-2 provides population densities
20 for AT&T and the rural incumbents. The data come from the same source as that
21 utilized by Staff to evaluate service area redefinition and the public interest. It is
22 taken from the 2000 U.S. Census records for population densities for cities within
23 Kansas. From these data, Staff calculated an average population density for the

1 combined service areas of AT&T (excluding Kansas City, Lawrence, Topeka, and
2 Wichita exchanges) and for the rural incumbent carriers along with Embarq. The
3 average population density for AT&T is 37.83 persons per square mile. The
4 average population density for the rural incumbent carriers and Embarq is 13.64
5 persons per square mile. From the data, it is evident that the areas served by rural
6 incumbent carriers and Embarq are generally less densely populated than the area
7 served by AT&T even when excluding the most urban service areas.

8
9 Staff has also calculated the average population density for the AT&T service
10 areas in which ALLTEL, RCC, USCOC and Sprint are designated as ETCs. (See
11 Rebuttal Exhibit JB-2) The average population density in the AT&T service areas
12 served by ALLTEL is 30.44 persons per square mile. The average population
13 density for the AT&T service areas served by RCC is 19.62 persons per square
14 mile. The average population density for the AT&T service areas served by
15 USCOC is 41.01 persons per square mile. The average population density for the
16 AT&T service areas served by Sprint is 501.81 persons per square mile. All of
17 these competitive ETCs serve AT&T areas with greater than the population
18 density for the rural incumbent carriers and Embarq as shown above.

19
20 Again, the discussion of whether AT&T's service area contains high-cost areas is
21 not particularly relevant to the issue at hand. It is Staff's assertion that, if high-
22 cost USF support is not available for a particular service area given the FCC's
23 determinations on support, it was not intended that support derived from

1 providing service to customers in other service areas be spent in the
2 “unsupported” area.
3

4 **Q If the Commission does not agree with Staff and believes that high-cost**
5 **support can be spent in AT&T service areas, could the Commission limit the**
6 **expenditures to just those service areas believed to be higher cost?**

7 **A** Although the competitive ETCs have asserted a need to be able to use the support
8 in higher cost areas, they have not proposed criteria for determining such areas.
9 Consequently, if the Commission were to agree with the competitive ETCs, the
10 Commission would need to establish a procedure for determining AT&T areas
11 that would be eligible. Staff believes it would be difficult to create a methodology
12 for determining which of AT&T service areas are in need of high-cost support.
13 Staff would suggest that there is clearly no justification for allowing support to be
14 used in areas that are not high-cost by any measure. It should be obvious that
15 such determinations would likely lead to much debate regarding the proper
16 measure of cost and the cost eligibility levels, as well as countless other issues.
17

18 If the competitive ETCs have ready and reasonable answers to all these
19 questions, then it is likely to be more appropriate to provide this information to
20 the FCC so that the high-cost model can be modified. From the testimony of the
21 competitive ETCs, it appears the problem they have identified is with the
22 targeting of high-cost support.
23

1 **Competitive Neutrality**

2 **Q Mr. Wood (at page 33) and Mr. Frentrup (at page 5) indicate that they**
3 **believe it is competitively neutral to permit a competitive ETC to use high-**
4 **cost USF support subject to Commission certification requirements in an**
5 **area where the incumbent ETC does not receive that type of USF support.**
6 **Do you agree?**

7 **A No.** As reviewed at the beginning of this testimony, the FCC implemented
8 competitively neutral porting of support so that “. . .no entity receives an unfair
9 competitive advantage that may skew the marketplace. . .” It would not be
10 competitively neutral for one carrier to make use of explicit USF support in an
11 area where others carrier cannot gain access to that same level of support on a
12 per-line basis. Additionally, the FCC has stated that,

13 [w]e agree with the Joint Board that competitive neutrality
14 is a fundamental principle of universal service reform and
15 that portability of support is necessary to ensure that
16 universal service support is distributed in a competitively
17 neutral manner. We also agree with US West that
18 “portability” of support should not be used to divert federal
19 funds from high-cost areas to other areas.⁷
20

21 As the FCC states, it would not be competitively neutral to permit a competitive
22 ETC to divert or misallocate funds from the areas that receive high-cost support to
23 use in the AT&T service area. The competitively neutral porting of support was
24 meant to put a competitive ETC on even footing with the incumbent carrier, and
25 other ETCs providing service in the same service areas, to the extent the

⁷ In the Matter of Federal-State Joint Board on Universal Service and In the Matter of Access Charge Reform, CC Dockets No. 96-45 and 96-262, *Seventh Report and Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45 and Fourth Report and Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking*, released May 28, 1999, paragraph 73.

1 incumbent received explicit federal support. The areas served by AT&T do not
2 receive federal high-cost funds other than IAS. It is competitively neutral to
3 permit a competitive ETC to have access to IAS and make use of that support in
4 AT&T's service area. Since AT&T receives no other federal funds, there is no
5 support to be ported to the competitive ETC and no need for the competitive ETC
6 to use additional federal funds in the AT&T service area to be placed on even
7 footing with other ETCs with regard to explicit federal subsidies. While it may be
8 costly to serve in some of AT&T's service area, the competitive ETC must rely
9 on its own efficiency to compete in those areas and/or apply for ETC designation
10 to enable it to receive KUSF support as AT&T does.

11
12 **Service Areas**

13 **Q Mr. Mowery (page 9), Mr. Frentrup (pages 3 – 4), and Mr. Wood (pages 23 –**
14 **26) all seem to disagree with Staff's interpretation of a service area. Could**
15 **you please explain Staff's position?**

16 **A** In its orders designating ALLTEL, Sprint, RCC, and USCOC as ETCs, the
17 Commission provides a discussion of service areas. For instance, in its *Order*
18 *Granting ETC Designation and Addressing Additional Issues* designating
19 ALLTEL as an ETC, the Commission states as follows:

20 Section 214(e)(5) of the Federal Act defines "service area"
21 as:

22 The term "service area" means a geographic
23 area established by a State commission for
24 the purpose of determining universal service
25 obligations and support mechanisms. In the
26 case of an area served by a rural telephone
27 company, "service area" means such

1 company's "study area" unless and until the
2 [Federal Communications] Commission and
3 the States, after taking into account
4 recommendations of a Federal-State Joint
5 Board instituted under section 410(c),
6 establish a different definition of service
7 area for such company.
8

9 "Service areas" or "operating areas" are defined by the
10 state act in K.S.A. 66-1,187(k). K.S.A. 66-1,187(k)
11 provides that:

12 (1) In the case of a rural telephone
13 company, operating area or service area
14 means such company's study area or areas
15 as approved by the federal communications
16 commission;

17 (2) in the case of a local exchange
18 carrier, other than a rural telephone
19 company, operating area or service area
20 means such carrier's local exchange service
21 area or areas as approved by the
22 commission.
23

24 Thus, to be designated as an ETC, a carrier must offer its
25 services throughout a rural telephone company's entire
26 study area, unless this Commission and the FCC approve a
27 different service area. Wire centers are the service area
28 currently designated by the Commission for universal
29 service support for areas served by non-rural telephone
30 companies. . . .⁸
31

32 The Commission provided the same or similar explanation in the orders for RCC,
33 Sprint, and USCOC. In the *ALLTEL Order*, the Commission states that,
34 "ALLTEL indicates the company will offer service throughout the service areas

⁸ In the Matter of the Application of ALLTEL Kansas Limited Partnership for Designation as an Eligible Telecommunications Carrier Pursuant to Section 47 U.S.C. § 214(e)(2) of the Communications Act of 1934, *Order Granting ETC Designation and Addressing Additional Issues*, September 24, 2004, paragraph 7. ("ALLTEL Order")

1 in which it is designated as an ETC using its own facilities.”(emphasis added)⁹

2 Further, the Commission stated:

3 The Commission finds that ALLTEL will be designated as
4 an ETC in the SWBT wire centers listed in Attachment A
5 to this Order, if the company agrees to the additional
6 requirements imposed by this order.¹⁰
7

8 The Commission also stated:

9 The Commission concludes that it is in the public interest
10 to designate ALLTEL as an additional ETC in requested
11 service areas of rural ILECs, subject to the company
12 fulfilling the additional requirements imposed by this order
13 and to the extent that the company’s operating footprint
14 coincides with the service area of a rural ILEC.
15 Attachment B sets out those rural service areas which
16 ALLTEL’s operating footprint covers without need for
17 redefinition.¹¹
18

19 Very similar, if not the same, language is found in the Commission’s order
20 designating RCC as an ETC. Additionally, in its *Order No. 14: Order Granting*
21 *ETC Designation and Addressing Additional Issues* in Docket No. 04-RCCT-338-
22 ETC, the Commission finds that,

23 [t]o the extent that RCC is capable of providing service
24 throughout an entire SWBT wire center and meets the
25 requirements imposed by this Order, it shall be designated
26 as an ETC in a particular wire center. (emphasis added)¹²
27

⁹ *Id.* Paragraph 21.

¹⁰ *Id.* Paragraph 29.

¹¹ *Id.* Paragraph 45.

¹² In the Matter of the Petition of RCC Minnesota, Inc. for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C. § 214(e)(2), Docket No. 04-RCCT-338-ETC, *Order No. 14: Order Granting ETC Designation and Addressing Additional Issues*, September 30, 2004, paragraph 28.

1 It appears to Staff that the Commission was designating each carrier as an ETC in
2 particular service areas. No mention is made in any of the orders of one large
3 service area for the competitive ETC.

4
5 **Q Mr. Mowery and Mr. Wood cite to the fact that the Universal Service**
6 **Administrative Company ("USAC") assigns one study area code (SAC) to**
7 **ALLTEL and USCOC/RCC as evidence that the companies have one service**
8 **area. Is this persuasive?**

9 **A No. While USAC may assign codes to ease its administration of the USF, USAC**
10 does not determine service areas nor does it have the authority to do so.

11
12 **Q If the Commission finds that Staff's interpretation of the Commission's**
13 **orders and the statutory provisions regarding service areas is incorrect, does**
14 **that change Staff's opinion regarding the certification of use of high-cost**
15 **support?**

16 **A No. It is still Staff's opinion that high-cost USF support should be spent in areas**
17 that have been designated to receive such support. It is still true that a
18 competitive ETC can choose those areas in which it wishes to be designated as an
19 ETC. The competitive ETC does not have to include AT&T service areas in its
20 request for designation if it believes it cannot meet universal service obligations
21 without the use of high-cost USF support.

22
23

1 **Direct Testimony of Mr. Mowery**

2 **Q On pages 4 – 6 of his testimony, Mr. Mowery asserts that it is appropriate for**
3 **ALLTEL to utilize high-cost support in AT&T service areas because AT&T**
4 **receives IAS, KUSF support, and the low population densities in some of**
5 **AT&T's service areas are all indicative of the high-cost nature of serving in**
6 **that area thereby making it appropriate to use high-cost support in AT&T**
7 **service areas. Do you agree?**

8 **A No. It is inappropriate to circumvent the goals for use of federal high-cost**
9 **support to provide service in the AT&T service areas. No federal high-cost**
10 **support, other than IAS, is available for use in the AT&T service area. ALLTEL**
11 **may apply for designation as an ETC to receive KUSF support if it believes it**
12 **needs support to provide service in the AT&T area. As stated above, ALLTEL**
13 **may petition the FCC to revisit and revise the high-cost model used to determine**
14 **the level of USF support in AT&T's service area if it believes the model is not**
15 **reflective of an efficient carrier's ability to provide service. However, ALLTEL**
16 **and other competitive ETCs should not be permitted to divert federal support**
17 **from those areas where the FCC determined the support was needed to achieve**
18 **universal service goals to areas where the FCC determined support was not**
19 **necessary to meet those same goals.**

20

21 **Q Mr. Mowery, at page 6 of his testimony, states that the Commission's current**
22 **certification forms and procedures are a "misguided attempt to protect**
23 **SWBT from competitors." Do you share this opinion?**

1 A No. In recommending the certification forms and procedures to the Commission,
2 it was not Staff's intent to insulate AT&T from competition. However, the FCC's
3 high-cost model results indicate that high-cost support is not necessary for an
4 efficient carrier to be able to provide universal service in the AT&T service areas.
5 Therefore, it would not be competitively neutral to permit a competitive ETC to
6 utilize high-cost support (other than IAS) to provision service in an area where the
7 same support is not available to other ETCs. This is not an attempt to insulate
8 AT&T from competition but an attempt to promote efficient market outcomes
9 within the parameters set out by the FCC.

10

11 **Q At page 8 of his testimony, Mr. Mowery states that the Commission has**
12 **created a "contradiction" by designating ALLTEL as an ETC in service**
13 **areas where it may not utilize high-cost support. Please comment on this**
14 **observation.**

15 A ALLTEL determined the incumbent carrier service areas for which it would
16 submit an application to be designated as an ETC. The Commission did not
17 mandate that ALLTEL, or any other ETC applicant, request designation in an area
18 for which high-cost USF is not available. Because the Commission did not
19 mandate particular service areas be included in an application for designation, the
20 Commission has not created a contradiction through its procedures to ensure that
21 USF is used for the intended purpose. If an ETC believes that it cannot meet its
22 universal service obligations without utilizing high-cost support (other than IAS)
23 in service areas for which high-cost support is not available, the ETC may

1 relinquish its designation. Again, the ETC may also apply for ETC designation to
2 receive any KUSF support that is available in the service areas it has selected.

3

4 **Q Mr. Mowery states that, through its order designating ALLTEL as an ETC,**
5 **the Commission has authorized ALLTEL to expend USF support in all**
6 **service areas where designation was received (See page 9 of his testimony.).**
7 **Do you agree?**

8 A No. The Commission's *Order Granting ETC Designation and Addressing*
9 *Additional Issues* clearly states that ALLTEL will be subject to an annual process
10 to certify the use of support.¹³ The Commission acknowledged that it was in the
11 process of reexamining its certification procedures at the time the ETC
12 designation was granted.¹⁴ Thus, the Commission did not authorize use of
13 support within its order designating ALLTEL as an ETC but specifically indicated
14 that certification of the use of support would be required on an annual basis.

15

16 **Q At page 12 of his testimony, Mr. Mowery discusses ALLTEL's provision of**
17 **service in Nickerson, a community within AT&T's service areas. Can you**
18 **address the concerns raised by Mr. Mowery?**

19 A Mr. Mowery indicates that ALLTEL received a letter from a customer requesting
20 improved wireless service in Nickerson. Mr. Mowery also indicates that the
21 Commission's certification procedures and forms inhibit ALLTEL's ability to
22 invest in facilities to enhance the service in Nickerson. Attached is Rebuttal

¹³ *ALLTEL Order*, paragraph 46.

¹⁴ *Id.* Paragraph 48.

1 Exhibit JB-3. This exhibit contains two maps; a map of the Nickerson exchange
2 area showing surrounding incumbent carriers' service areas and a topographical
3 map of the Nickerson exchange area. The Nickerson exchange is approximately 9
4 miles by 13 miles at its widest points. The Nickerson exchange is closely
5 bordered by Embarq and Mutual Telephone Company ("Mutual"). Nickerson is
6 in a slightly lower lying area than the areas served by Embarq or Mutual.

7
8 The Commission designated ALLTEL as an ETC within the study area of Mutual.
9 Thus, ALLTEL could either place investment within the Nickerson exchange and
10 allocate a portion of that investment for service to customers in the Mutual service
11 area or ALLTEL could place investment in the Mutual study area that could also
12 benefit Nickerson. ALLTEL would then be able to claim either a portion or all of
13 the investment in the certification process set out by the Commission.

14
15 **Q Beginning on page 11 of his testimony and continuing on to page 12, Mr.**
16 **Mowery states that the "only real beneficiaries" of the Commission's**
17 **certification procedures and forms are "entities, like SWBT, that seek to**
18 **deter competition and prevent investment in rural/high-cost areas. . ." Do**
19 **you agree?**

20 **A** No. AT&T did not propose the requirement to eliminate expenditures in areas
21 that high-cost support is not available. This requirement was proposed by Staff.
22 While AT&T is highly capable of defending itself, Staff does believe it is unfair
23 to imply that AT&T was seeking to deter competition through the current

1 certification process. Staff's motivation was to meet the statutory requirement
2 that support be expended for the intended purpose. Additionally, the real
3 beneficiaries of the current process are the consumers in the more rural areas of
4 the state where it has been determined that USF support is necessary to promote
5 universal service. The process ensures that investment will occur in areas of the
6 state where USF support is provided to ETCs for serving lines. The
7 Commission's certification process is necessary to ensure that these consumers
8 are not shortchanged.

9
10 **Q Mr. Mowery refers the Commission to the FCC's certification rules at page**
11 **14 of his testimony. Did the FCC provide any guidance on the**
12 **implementation of its rules?**

13 **A** Yes. The FCC states that in providing updates of its service improvement plan,
14 an ETC must include

15 information for each wire center in each service area for
16 which they expect to receive universal service support, or
17 an explanation of why service improvements in a particular
18 wire center are not needed and how funding will otherwise
19 be used to further the provision of supported services in
20 that area.¹⁵
21

22 Additionally the FCC stated that it would require an ETC to submit coverage
23 maps specifying where signal strength, coverage or capacity was improved "... in
24 each wire center in each service area for which funding was received."¹⁶
25

¹⁵ In the Matter of Federal-State Joint Board on Universal Service, CC Docket 96-45, *Report and Order*, released March 17, 2005, paragraph 23.

¹⁶ *Id.*

1 **Direct Testimony of Mr. Frentrup**

2 **Q Mr. Frentrup, at page 6, lines 3-5 and 12-14, states that Sprint is entitled to**
3 **spend USF support anywhere in its service area. Do you agree?**

4 **A No. Interestingly Mr. Frentrup states that,**¹⁷

5 . . .the federal universal service support mechanisms
6 are intended to incent competitive ETCs to reinvest the
7 support they receive to expand and improve service in areas
8 where the incumbent carrier receives higher levels of
9 universal service support, as that investment may be
10 expected to result in increased subscribership and, thereby,
11 increased levels of support to the competitive ETC.
12

13 Staff agrees with this portion of his testimony. However, Mr. Frentrup also seems
14 to imply that Sprint may spend USF support anywhere within its designated
15 service area as he understands that term. Many of the service areas in which
16 Sprint is designated as an ETC receive no support other than IAS. Additionally,
17 many of these areas would not be considered high-cost service areas. Sprint is
18 designated as an ETC in much of the Kansas City metro area, in Topeka, in
19 Lawrence and in portions of Wichita. Despite Sprint's assertion to the contrary, it
20 does not seem reasonable to Staff that the FCC or Congress would intend for
21 high-cost support to be expended in these areas.

22

23

24

¹⁷ In the Matter of a Review of the Commission's Federal USF Certification Requirement to Remove All Expenses and Investment by Competitive Eligible Telecommunications Carriers in a Southwestern Bell Telephone, L.P., Study Area from the Competitive Eligible Telecommunications Carrier's Justification of Use of High Cost Federal USF Support, Docket No. 07-GIMT-498-GIT, Direct Testimony of Chris Frentrup, page 6, lines 7 - 12.

1 **Direct Testimony of Mr. Wood**

2 **Q Mr. Wood states on page 10 of his testimony that the identity of the**
3 **incumbent serving an area does not determine whether an area is more or**
4 **less costly to serve. Do you agree?**

5 A Yes. Yet, in Kansas, the service areas of AT&T are the only areas that do not
6 receive USF support for which certification by the Commission is necessary. The
7 FCC has determined, through its high-cost model, that the areas served by AT&T
8 do not need USF support in order to meet universal service goals. Thus, for ease
9 of identification and administration, Staff proposed and the Commission approved
10 certification requirements which indicate that expenditures and investments in the
11 AT&T area must be excluded from a competitive ETC's justification of its use of
12 support.

13

14 **Q Do you agree with Mr. Wood's assertion beginning on page 14 that the**
15 **FCC's methods for determining whether an ILEC (and therefore a**
16 **competitive ETC) will receive USF support do not determine whether an**
17 **area is a high-cost area?**

18 A I agree that the FCC's methods for determining which areas are in need of USF
19 support are imperfect; however, we must work within the parameters set out by
20 the FCC for determining the need for USF support. Mr. Wood goes on to state on
21 page 16 of his testimony that "the model does not create reality." Yet it does
22 establish where support is available. While USCOC/RCC and others may not be
23 satisfied with the results of the high-cost model calculations or the embedded cost

1 method of determining whether the costs of an incumbent carrier are high enough
2 to warrant USF support, USCOC/RCC should address this issue with the FCC.
3 As stated previously, it is not appropriate to address this issue by permitting one
4 or more ETCs to misallocate support.
5

6 **Q Mr. Wood suggests on page 15 of his testimony that competitive ETCs are at**
7 **a disadvantage, compared to AT&T, when serving in AT&T service areas**
8 **because they may not have the same mix of high- and low-cost areas. Please**
9 **respond.**

10 **A** It is difficult to assess the veracity of this assertion since no cost data has been
11 provided. One would have to assume that the competitive ETC had the same (or
12 greater) cost as AT&T for serving high-cost areas for the unequal mix of high-and
13 low-cost areas to create a disadvantage for a competitor. This may or may not be
14 true. However, as stated previously, a competitive ETC is able to pick and choose
15 the service areas for which it requests designation as an ETC and can mitigate this
16 problem, if it exists. Additionally, this discussion strays from the issue. Whether
17 or not the area served by the competitive ETC requires the ETC to incur higher
18 costs in the opinion of experts is not relevant to the issue in this docket. The FCC
19 has determined that no high-cost support is necessary for AT&T to provide
20 universal service in its Kansas service areas. Thus, there is no support to be
21 ported to competitive ETCs serving lines in AT&T service areas. There is no
22 high-cost USF support (other than IAS) to be spent in AT&T service areas

1 without violating principles of competitive neutrality and the FCC's goal of
2 targeting of support to the highest cost areas.

3

4 **Q Does this conclude your testimony at this time?**

5 **A Yes.**

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

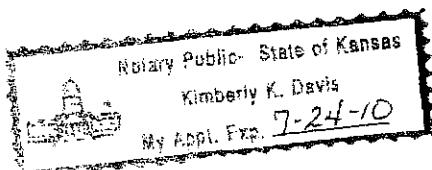
VERIFICATION

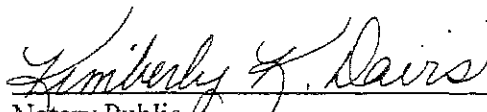
Janet Buchanan, being duly sworn upon her oath deposes and states that she is Chief of Telecommunications for the Utilities Division of the Kansas Corporation Commission, State of Kansas, that she has read and is familiar with the foregoing *Rebuttal Testimony*, and that the statements contained therein are true and correct to the best of her knowledge, information and belief.



Janet Buchanan
Chief of Telecommunication, Utilities Division
Kansas Corporation Commission
State of Kansas

Subscribed and sworn to before me this 18th day of May, 2007.




Notary Public

My Appointment Expires:

July 24, 2010

CERTIFICATE OF SERVICE

07-GIMT-498-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing REBUTTAL TESTIMONY was placed in the United States mail, postage prepaid, or hand-delivered this 18th day of May, 2007, to the following:

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07-GIMT-498-GIT

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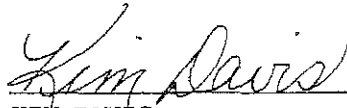
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KIM DAVIS
Administrative Specialist

Rebuttal Exhibit JB-1

Federal USF Support for Wireless Carriers in Kansas

Year 2006

Source: USAC web site: <http://www.universalservice.org/hc/tools/disbursements/default.aspx>

ALLTEL Communications (Wireless KS)

State	Spin	Study Area Code	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
KS	143008900	419905	\$2,158,293	\$0	\$40,639	\$1,373,617	\$406,287	\$0	\$43,618	\$0	2006	Dec
KS	143008900	419905	\$2,158,293	\$0	\$40,639	\$1,373,617	\$406,287	\$0	\$64,496	\$0	2006	Nov
KS	143008900	419905	\$2,121,758	\$0	\$36,382	\$1,373,617	\$406,287	\$0	\$359,883	\$0	2006	Oct
KS	143008900	419905	\$2,099,770	\$0	\$40,875	\$1,291,508	\$406,287	\$0	\$24,161	\$0	2006	Sep
KS	143008900	419905	\$2,099,833	\$0	\$40,875	\$1,291,508	\$406,402	\$0	\$24,326	\$0	2006	Aug
KS	143008900	419905	\$2,092,030	\$0	\$45,012	\$1,291,508	\$406,172	\$0	\$24,137	\$0	2006	Jul
KS	143008900	419905	\$2,120,147	\$0	\$40,312	\$1,195,282	\$423,744	\$0	\$24,949	\$0	2006	Jun
KS	143008900	419905	\$2,120,147	\$0	\$134,012	\$1,195,282	\$423,744	\$0	\$24,949	\$0	2006	May
KS	143008900	419905	\$2,104,151	\$0	(\$60,774)	\$1,195,282	\$423,744	\$0	\$25,303	\$0	2006	Apr
KS	143008900	419905	\$1,991,751	\$0	\$38,279	\$1,147,416	\$409,631	\$0	\$24,102	\$0	2006	Mar
KS	143008900	419905	\$1,991,751	\$0	\$38,279	\$1,147,416	\$409,631	\$0	\$24,102	\$0	2006	Feb
KS	143008900	419905	\$1,991,751	\$0	\$38,720	\$1,147,416	\$409,631	\$0	\$24,102	\$0	2006	Jan
Total for Year 2006			\$25,049,675	\$0	\$473,250	\$15,023,469	\$4,937,847	\$0	\$688,128	\$0		
Total - All Support												\$46,172,369

Sprint Spectrum LP / Phillieco LP (dba Sprint PCS)

State	Spin	Study Area Code	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
KS	143006742	419002	\$149,684	\$0	\$31,137	\$0	\$7,503	\$0	\$0	\$0	2006	Dec
KS	143006742	419002	\$149,684	\$0	\$31,137	\$0	\$7,503	\$0	\$0	\$0	2006	Nov
KS	143006742	419002	\$148,190	\$0	\$22,377	\$0	\$7,503	\$0	\$0	\$0	2006	Oct
KS	143006742	419002	\$149,858	\$0	\$30,812	\$0	\$7,503	\$0	\$0	\$0	2006	Sep
KS	143006742	419002	\$149,858	\$0	\$30,812	\$0	\$7,503	\$0	\$0	\$0	2006	Aug
KS	143006742	419002	\$147,029	\$0	\$28,973	\$0	\$7,503	\$0	\$0	\$0	2006	Jul
KS	143006742	419002	\$144,558	\$0	\$35,589	\$0	\$7,581	\$0	\$0	\$0	2006	Jun
KS	143006742	419002	\$144,558	\$0	\$35,589	\$0	\$7,581	\$0	\$0	\$0	2006	May
KS	143006742	419002	\$137,571	\$0	\$40,740	\$0	\$18,465	\$0	\$0	\$0	2006	Apr
KS	143006742	419002	\$130,739	\$0	\$34,655	\$0	\$7,258	\$0	\$0	\$0	2006	Mar
KS	143006742	419002	\$130,739	\$0	\$34,655	\$0	\$7,258	\$0	\$0	\$0	2006	Feb
KS	143006742	419002	\$130,739	\$0	\$39,722	\$0	\$7,258	\$0	\$0	\$0	2006	Jan
Total for Year 2006			\$1,713,207	\$0	\$396,198	\$0	\$100,419	\$0	\$0	\$0		
Total - All Support												\$2,209,824

USCOC of Nebraska/Kansas LLC

State	Spin	Study Area Code	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
KS	143000654	419012	\$303,887	\$0	\$62,346	\$191,996	\$59,853	\$0	\$10,835	\$0	2006	Dec
KS	143000654	419012	\$303,887	\$0	\$62,346	\$191,996	\$59,853	\$0	\$10,979	\$0	2006	Nov
KS	143000654	419012	\$303,887	\$0	\$62,346	\$191,996	\$59,853	\$0	\$10,691	\$0	2006	Oct
KS	143000654	419012	\$0	\$0	\$62,346	\$175,185	\$0	\$0	\$0	\$0	2006	Sep
KS	143000654	419012	\$0	\$0	\$68,079	\$350,370	\$0	\$0	\$0	\$0	2006	Aug
KS	143000654	419012	\$0	\$0	\$56,613	\$0	\$0	\$0	\$0	\$0	2006	Jul
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Jun
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	May
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Apr
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Mar
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Feb
KS	143000654	419012	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2006	Jan
Total for Year 2006			\$911,661	\$0	\$374,076	\$1,101,543	\$179,559	\$0	\$32,505	\$0		
Total - All Support												\$2,599,344

RCC Minnesota, Inc.

State	Spin	Study Area Code	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	Year	Month
KS	143000896	419003	\$194,603	\$0	\$1,580	\$94,469	\$33,387	\$0	\$1,557	\$0	2006	Dec
KS	143000896	419003	\$194,603	\$0	\$1,580	\$94,469	\$33,387	\$0	\$1,557	\$0	2006	Nov
KS	143000896	419003	\$191,234	\$0	\$800	\$94,469	\$33,387	\$0	\$8,582	\$0	2006	Oct
KS	143000896	419003	\$192,321	\$0	\$1,742	\$102,617	\$33,387	\$0	\$1,243	\$0	2006	Sep
KS	143000896	419003	\$192,321	\$0	\$1,742	\$102,617	\$33,387	\$0	\$1,243	\$0	2006	Aug
KS	143000896	419003	\$189,966	\$0	\$1,205	\$102,617	\$33,387	\$0	\$1,243	\$0	2006	Jul
KS	143000896	419003	\$196,427	\$0	\$1,919	\$111,484	\$35,098	\$0	\$1,255	\$0	2006	Jun
KS	143000896	419003	\$196,427	\$0	\$1,919	\$111,484	\$35,098	\$0	\$1,255	\$0	2006	May
KS	143000896	419003	\$194,561	\$0	\$1,412	\$111,484	\$35,098	\$0	\$1,258	\$0	2006	Apr
KS	143000896	419003	\$204,005	\$0	\$2,008	\$117,682	\$37,197	\$0	\$1,304	\$0	2006	Mar
KS	143000896	419003	\$204,005	\$0	\$2,008	\$117,682	\$37,197	\$0	\$1,304	\$0	2006	Feb
KS	143000896	419003	\$204,005	\$0	\$1,825	\$117,682	\$37,197	\$0	\$1,304	\$0	2006	Jan
Total for Year 2006			\$2,354,478	\$0	\$19,740	\$1,278,756	\$417,207	\$0	\$23,105	\$0		
Total - All Support												\$4,093,286

Rebuttal Exhibit JB-2

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
BLUE VALLEY TEL. CO.				
Axtell	84.43	1,638	1,343	15.91
Beattie	72.83	1,348	1,105	15.18
Centralia	83.47	1,839	1,508	18.07
Home City	55.04	1,224	1,004	18.24
Linn	83.60	1,087	891	10.66
Oketo	90.41	1,596	1,309	14.48
Onaga	130.69	2,814	2,307	17.66
Palmer	67.00	1,125	923	13.77
Summerfield	41.63	997	818	19.64
Vermillion	99.85	1,395	1,144	11.46
Westmoreland	127.14	1,575	1,292	10.16
Wheaton	87.26	1,735	1,423	16.30
	<u>1023.35</u>		<u>15,068</u>	<u>14.72</u>
SUNFLOWER/BLUESTEM				
Americus	177.89	4,423	3,627	20.39
Cedar Point	146.83	473	388	2.64
Saffordville	78.37	437	358	4.57
Jetmore	423.78	1,464	1,200	2.83
Leoti	711.40	2,907	2,384	3.35
Marienthal	135.00	401	329	2.44
Sharon Springs	393.46	1,282	1,051	2.67
Tribune	769.45	1,845	1,513	1.97
Wallace	303.89	623	511	1.68
Weskan	208.23	357	293	1.41
	<u>3348.30</u>		<u>11,654</u>	<u>3.48</u>
COLUMBUS TEL. CO.				
Columbus City	0.77	1,203	986	1,281.12
COUNCIL GROVE TEL. CO.				
Council Grove	223.23	3,597	2,950	13.21
CUNNINGHAM TEL. CO.				
Cawker City	90.94	2,013	1,651	18.15
Formoso	95.04	486	399	4.19
Glen Elder	130.40	1,765	1,447	11.10
Jamestown	163.81	2,062	1,691	10.32
Randall	67.34	403	330	4.91
Simpson	109.91	680	558	5.07
	<u>657.44</u>		<u>6,075</u>	<u>9.24</u>
CRAW-KAN TEL COOP.				
Arcadia	30.84	1,294	1,061	34.41
Arma	31.72	3,797	3,114	98.16
Asbury MO	18.48	319	262	14.15
Bartlett	48.29	1,201	985	20.39
Brazilton	29.92	466	382	12.77
Bronson	108.03	1,959	1,606	14.87
Cherokee	43.81	1,581	1,296	29.59
Colony	83.19	1,555	1,275	15.33
Columbus Rural	112.35	5,202	4,266	37.97
Crestline	44.18	788	646	14.63
Devon	46.80	541	444	9.48
Edna	100.82	1,941	1,592	15.79
Farlington	49.87	1,886	1,547	31.01
Foster MO	1.80	82	67	37.36
Fulton	70.02	1,459	1,196	17.09
Galesburg	72.40	1,582	1,297	17.92
Girard	152.39	6,867	5,631	36.95
Hallowell	124.00	1,849	1,516	12.23
Hepner	58.23	1,608	1,319	22.64
Hiattville	78.97	1,350	1,107	14.02
McCune	117.57	2,661	2,182	18.56
Mulberry	21.38	1,129	926	43.30
Pleasanton	79.54	2,751	2,256	28.36

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Prescott	56.71	834	684	12.06
Savonburg	161.17	3,079	2,525	15.67
South Mound	23.43	607	498	21.24
Uniontown	108.71	2,194	1,799	16.55
Walnut	56.29	1,661	1,362	24.20
Weir	43.74	1,885	1,546	35.34
West Mineral	67.45	1,978	1,622	24.05
	2042.10		46,007	22.53
ELKHART TEL. CO.				
Elkhart	165.03	2,547	2,089	12.66
GOLDEN BELT TEL. ASSN.				
Albert	82.95	1,006	825	9.94
Alexander	67.61	282	231	3.42
Bazine	179.01	731	599	3.35
Beeler	256.59	770	631	2.46
Bison	107.00	577	473	4.42
Brownell	120.08	408	335	2.79
Burdett	206.66	1,506	1,235	5.98
Ellis	316.86	6,712	5,504	17.37
Garfield	108.12	816	669	6.19
Lewis	172.32	1,279	1,049	6.09
McCracken	179.57	1,667	1,367	7.61
Ness City	340.49	2,312	1,896	5.57
Otis	96.60	1,416	1,161	12.02
Ransom	285.13	1,184	971	3.41
Rozel	133.34	1,038	851	6.38
Rush Center	105.20	926	759	7.22
Timken	60.56	298	244	4.04
Utica	298.48	568	466	1.56
	3116.57		19,267	6.18
GORHAM TEL. CO.				
Gorham	87.58	1,592	1,305	14.91
Luray	99.11	994	815	8.22
Paradise	103.29	1,064	872	8.45
Waldo	104.36	976	800	7.67
	394.34		3,793	9.62
H&B				
Bushton	80.64	1,180	968	12.00
Dorrance	150.32	1,401	1,149	7.64
Holyrood	76.36	1,518	1,245	16.30
	307.32		3,361	10.94
HOME TEL.				
Assaria	58.02	1,684	1,381	23.80
Galva	95.24	2,502	2,052	21.54
Geneseo	90.24	1,812	1,486	16.47
Roxbury	43.45	910	746	17.17
Salemsburg	77.95	1,746	1,432	18.37
	364.90		7,096	19.45
HAVILAND TELEPHONE CO.				
Argonia	121.03	2,725	2,235	18.46
Coats	88.85	288	236	2.66
Conway Springs	125.43	3,226	2,645	21.09
Cullison	107.16	747	613	5.72
Haviland	199.15	1,125	923	4.63
Isabel	82.26	431	353	4.30
Mullinville	175.02	690	566	3.23
Nashville	97.00	896	735	7.57
Norwich	126.25	2,073	1,700	13.46
Riverdale	40.05	888	728	18.18
Sawyer	84.07	532	436	5.19
Wilmore	249.09	262	215	0.86
	1495.36		11,384	7.61

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
JBN TELEPHONE CO.				
Agenda	69.61	502	412	5.91
Barnes	87.89	1,420	1,164	13.25
Corning	66.04	935	767	11.61
Cuba	102.94	1,367	1,121	10.89
Fairview	75.46	1,183	970	12.86
Goff	53.00	825	677	12.76
Haddam	78.34	583	478	6.10
Havensville	54.13	1,551	1,272	23.50
Mahaska	41.02	233	191	4.66
Morrowville	82.58	783	642	7.78
Munden	65.87	896	735	11.15
Narka	44.79	496	407	9.08
Netawaka	45.60	1,033	847	18.58
Soldier	36.87	984	807	21.88
Wetmore	85.35	1,206	989	11.59
	<u>989.49</u>		<u>11,478</u>	<u>11.60</u>
KAN OKLA TEL. CO.				
Bluff City	70.35	263	216	3.07
Caldwell	133.18	3,536	2,900	21.77
Corbin	74.61	1,817	1,490	19.97
Freeport	91.88	553	453	4.94
Geuda Springs	58.77	1,516	1,243	21.15
Hardtner	100.64	427	350	3.48
Manchester OK	21.09	25	21	0.97
Mayfield	53.22	700	574	10.79
South Haven	127.94	1,675	1,374	10.74
Waldron	32.60	100	82	2.52
	<u>764.28</u>		<u>8,702</u>	<u>11.39</u>
LA HARPE TEL. CO.				
La Harpe	63.90	1,863	1,528	23.91
MADISON TEL. LLC				
Lamont	67.28	482	395	5.87
Madison	128.85	1,851	1,518	11.78
	<u>196.13</u>		<u>1,913</u>	<u>9.75</u>
MO-KAN DIAL				
Hillsdale	25.69	1,223	1,003	39.04
Louisburg	71.78	5,016	4,113	57.30
Rantoul	44.88	1,112	912	20.32
	<u>142.35</u>		<u>6,028</u>	<u>42.35</u>
MOUNDRIDGE				
Goesse	113.45	2,797	2,294	20.22
Moundridge	144.12	4,220	3,460	24.01
	<u>257.57</u>		<u>5,754</u>	<u>22.34</u>
MUTUAL TEL. CO.				
Little River	127.34	1,603	1,314	10.32
PEOPLES TELECOMMUNICATIONS				
La Cygne	147.45	3,028	2,483	16.84
PIONEER TEL. ASSN.				
Big Bow	130.71	410	336	2.57
Coolidge	338.99	245	201	0.59
Deerfield	140.19	1,728	1,417	10.11
Hugoton	431.25	5,009	4,107	9.52
Johnson City	421.16	1,841	1,510	3.58
Kendall	182.40	212	174	0.95
Lakin	514.67	3,025	2,481	4.82
Manter	157.96	332	272	1.72

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Moscow	248.36	2,366	1,940	7.81
Richfield	326.63	279	229	0.70
Rolla	298.14	1,446	1,186	3.98
Ryus	72.10	305	250	3.47
Satania	177.67	2,254	1,848	10.40
Syracuse	543.82	2,208	1,811	3.33
Ulysses	538.15	10,894	8,933	16.60
	4522.20		26,694	5.90
RAINBOW TEL. COOP. ASSN.				
Bendena	30.54	556	456	14.93
Denton	77.30	1,191	977	12.63
Everest	42.67	1,111	911	21.35
Huron	62.95	1,868	1,532	24.33
Muscotah	97.97	1,959	1,606	16.40
Robinson	72.50	993	814	11.23
Whiting	50.32	1,076	882	17.53
Willis	40.90	531	435	10.65
	475.15		7,614	16.02
RURAL TEL. CO.				
Agra	124.46	1,336	1,096	8.80
Alton	130.53	994	815	6.24
Athol	98.43	796	653	6.63
Burr Oak	134.76	997	818	6.07
Collyer	117.21	931	763	6.51
Courtland	66.96	871	714	10.67
Damar	154.02	1,026	841	5.46
Downs	118.96	1,676	1,374	11.55
Edmond	154.53	1,176	964	6.24
Esbon	123.10	555	455	3.70
Galatia	83.49	1,850	1,517	18.17
Gaylord	146.53	927	760	5.19
Gove	198.00	514	421	2.13
Grainfield	202.00	1,022	838	4.15
Hill City	300.76	2,986	2,449	8.14
Ionia	62.96	222	182	2.89
Jennings	191.71	663	544	2.84
Kensington	166.81	1,390	1,140	6.83
Lebanon	274.49	2,812	2,306	8.40
Lenora	243.17	1,192	977	4.02
Logan	263.82	2,373	1,946	7.38
Long Island	64.92	645	529	8.15
Morland	321.29	969	795	2.47
Natoma	255.96	1,361	1,116	4.36
Olmitz	30.77	1,318	1,081	35.12
Osborne	300.43	2,651	2,174	7.24
Palco	155.86	1,376	1,128	7.24
Prairie View	68.79	1,231	1,009	14.67
Quinter	197.47	1,710	1,402	7.10
Republic	77.23	945	775	10.03
Rexford	140.48	868	712	5.07
Russell	319.26	6,238	5,115	16.02
Selden	201.31	890	730	3.63
Victoria	168.78	5,717	4,688	27.78
Wakeeney	501.17	3,896	3,195	6.37
Webber	57.53	662	543	9.44
Woodruff	42.81	287	235	5.50
Woodston	140.04	634	520	3.71
Zurich	62.51	625	513	8.20
	6463.31		47,832	7.40
S&A TEL. CO.				
Allen	139.34	2,826	2,317	16.63
Scranton	45.62	1,966	1,612	35.34
	184.96		3,929	21.24

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
S&T TEL. COOP.				
Brewster	358.10	2,087	1,711	4.78
Grinnell	290.93	1,140	935	3.21
Healy	170.05	466	382	2.25
Kanorado	227.45	1,390	1,140	5.01
Levant	140.06	1,329	1,090	7.78
Menlo	134.51	668	548	4.07
Russell Springs	332.32	418	343	1.03
Winona	320.93	1,644	1,348	4.20
Dighton	532.07	2,124	1,742	3.27
	<u>2506.42</u>		<u>9,238</u>	<u>3.69</u>
SOUTH CENTRAL				
Kiowa	96.08	1,888	1,548	16.11
Hazleton	126.82	1,116	915	7.22
Iuka	88.52	1,321	1,083	12.24
Lake City	233.18	298	244	1.05
Sharon	80.52	608	499	6.19
Sun City	117.86	185	152	1.29
Turon	94.02	756	620	6.59
	<u>837.00</u>		<u>5,061</u>	<u>6.05</u>
SOUTHERN KANSAS TEL. CO.				
Atlanta	116.97	3,001	2,461	21.04
Beaumont	69.72	654	536	7.69
Burden	80.91	2,094	1,717	21.22
Cambridge	99.76	1,161	952	9.54
Clearwater	120.75	11,479	9,413	77.95
Dexter	207.23	1,493	1,224	5.91
Elk Falls	73.47	281	230	3.14
Grenola	141.21	551	452	3.20
Latham	126.81	1,528	1,253	9.88
Longton	136.09	756	620	4.56
Piedmont	66.05	241	198	2.99
Reece	69.76	849	696	9.98
Rosalia	99.03	956	784	7.92
	<u>1407.76</u>		<u>20,536</u>	<u>14.59</u>
AT&T				
Abilene	95.96	8,105	6,646	69.26
Almena	126.11	1,006	825	6.54
Andale	52.65	3,588	2,942	55.88
Andover Zone	71.13	15,400	12,628	177.53
Anthony	181.68	2,884	2,365	13.02
Arkansas City	194.08	18,629	15,276	78.71
Atchison	98.18	12,895	10,574	107.70
Attica	138.81	2,486	2,039	14.69
Atwood	514.52	2,859	2,344	4.56
Augusta Zone	145.77	15,214	12,475	85.58
Basehor	42.17	6,749	5,534	131.24
Belleville	109.83	3,267	2,679	24.39
Beloit	271.86	4,846	3,974	14.62
Benton Zone	42.78	2,096	1,719	40.18
Bethel Zone	43.09	37,881	31,062	720.87
Bird City	262.62	1,350	1,107	4.22
Blue Rapids	245.97	4,810	3,944	16.04
Bonner Springs Zone	107.46	36,401	29,849	277.77
Bucklin	210.10	3,525	2,891	13.76
Burns	144.68	2,005	1,644	11.36
Caney	39.11	3,708	3,041	77.74
Canton	86.02	2,981	2,444	28.42
Cedar Vale	188.39	1,259	1,032	5.48
Chanute	166.92	12,887	10,567	63.31
Chapman	61.96	2,852	2,339	37.74
Chase	86.04	1,119	918	10.66
Cheney	135.36	9,855	8,081	59.70
Cherryvale	121.25	6,746	5,532	45.62

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Chetopa	41.30	2,603	2,134	51.68
Clay Center	188.86	5,464	4,480	23.72
Clinton	44.75	1,912	1,568	35.04
Coffeyville	130.18	17,171	14,080	108.16
Colby	511.63	8,764	7,186	14.05
Coldwater	375.88	1,314	1,077	2.87
Colwich Zone	85.19	7,099	5,821	68.33
Concordia	240.57	8,106	6,647	27.63
Cottonwood Falls	380.58	2,423	1,987	5.22
De Soto	39.97	8,508	6,977	174.54
Derby Zone	38.58	24,489	20,081	520.50
Dodge City	465.86	27,471	22,526	48.35
Douglass	96.59	3,261	2,674	27.68
El Dorado	227.43	18,052	14,803	65.09
Ellsworth	393.75	5,834	4,784	12.15
Elwood	6.53	1,135	931	142.53
Emporia	271.49	31,499	25,829	95.14
Erie	102.57	3,597	2,950	28.76
Eudora	56.54	9,867	8,091	143.10
Eureka	391.98	4,770	3,911	9.98
Florence	76.57	981	804	10.51
Fort Scott	148.62	11,373	9,326	62.75
Fowler	246.73	1,617	1,326	5.37
Frankfort	155.31	2,592	2,125	13.69
Garden City	1125.39	44,126	36,183	32.15
Garden Plain	46.92	7,793	6,390	136.19
Goddard Zone	60.18	11,313	9,277	154.15
Goodland	666.47	7,892	6,471	9.71
Great Bend	213.91	19,390	15,900	74.33
Greenfield Zone	48.83	6,271	5,142	105.31
Greensburg	237.93	2,309	1,893	7.96
Gypsum	127.40	5,118	4,197	32.94
Halstead	83.91	1,826	1,497	17.84
Hamilton	156.61	1,080	886	5.65
Hanover	175.65	1,905	1,562	8.89
Harper	198.03	3,820	3,132	15.82
Hartford	83.88	2,026	1,661	19.81
Hays	358.21	24,144	19,798	55.27
Herington	2.63	14	11	4.37
Herington	60.04	3,522	2,888	48.10
Herndon	207.04	1,233	1,011	4.88
Howard	158.97	1,257	1,031	6.48
Hoxie	287.96	2,410	1,976	6.86
Humboldt	123.64	4,593	3,766	30.46
Hutchinson	218.40	49,071	40,238	184.24
Independence	153.42	15,967	13,093	85.34
Iola	109.70	8,354	6,850	62.45
Jackson Zone	103.91	48,986	40,152	386.41
Jewell	92.76	917	752	8.11
Kansas City Zone	76.76	229,671	188,330	2,453.49
Kechi Zone	68.72	14,855	12,181	177.26
Kingman	347.21	6,823	5,595	16.11
Kinsley	388.45	3,943	3,233	8.32
LaCrosse	137.21	1,966	1,612	11.75
Larned	311.80	7,957	6,525	20.93
Lawrence	182.75	78,584	64,439	352.61
Leavenworth	178.72	57,665	47,285	264.58
Lecompton Zone	72.30	5,775	4,738	65.50
Leon	123.45	3,050	2,501	20.26
Liberal	348.02	23,053	18,903	54.32
Lincoln	201.27	1,954	1,602	7.96
Lindsborg	126.43	5,552	4,553	36.01
Lyons	164.68	5,224	4,284	26.01
Manhattan	286.41	62,503	51,252	178.95
Mankato	137.90	1,356	1,112	8.06
Marion	158.74	4,319	3,542	22.31
Marquette	131.44	2,061	1,690	12.86

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Marysville	106.24	4,357	3,573	33.63
McDonald	291.57	543	445	1.53
McPherson	130.73	14,385	11,796	90.23
Meade	411.72	1,953	1,601	3.89
Medicine Lodge	337.77	2,964	2,430	7.20
Melrose Zone	83.45	210,100	172,282	2,064.49
Minneapolis	190.17	2,998	2,458	12.93
Minneola	329.85	1,629	1,336	4.05
Moline	105.37	831	681	6.47
Mount Hope	50.93	4,436	3,638	71.42
Mulvane Zone	63.62	11,604	9,515	149.56
Neodesha	98.65	4,897	4,016	40.70
Newton	135.43	12,016	9,853	72.75
Nickerson	112.26	6,044	4,956	44.15
Norcatour	217.59	1,202	986	4.53
North Topeka Zone	105.96	14,527	11,912	112.42
Norton	370.03	4,899	4,017	10.86
Oakley	484.00	3,822	3,134	6.48
Oberlin	389.88	3,521	2,887	7.41
Olathe Zone	72.63	77,240	63,337	872.05
Ottawa	162.53	15,708	12,881	79.25
Paola	129.47	10,185	8,352	64.51
Parkview Zone	62.23	45,892	37,631	604.72
Parsons	198.95	13,534	11,098	55.78
Pauline Zone	54.83	13,065	10,713	195.39
Pawnee Rock	119.07	2,019	1,656	13.90
Peabody	112.24	2,518	2,065	18.40
Phillipsburg	376.77	5,134	4,210	11.17
Pittsburg	111.29	23,757	19,481	175.04
Plains	436.41	3,239	2,656	6.09
Plainville	239.41	3,562	2,921	12.20
Pratt	179.87	7,637	6,262	34.82
Protection	242.89	991	813	3.35
Reading	81.70	2,057	1,687	20.65
Rose Hill Zone	53.02	7,250	5,945	112.13
Sabetha	121.08	3,635	2,981	24.62
Salina	281.10	54,232	44,470	158.20
Scandia	91.85	1,322	1,084	11.80
Scott City	837.38	5,431	4,453	5.32
Sedan	240.48	2,758	2,262	9.40
Sedgwick Zone	61.14	4,049	3,320	54.30
Seneca	249.75	5,821	4,773	19.11
Severy	90.43	1,146	940	10.39
Smith Center	117.25	2,322	1,904	16.24
Solomon	66.64	3,504	2,873	43.12
South Topeka Zone	104.22	5,841	4,790	45.96
St Francis	553.99	3,038	2,491	4.50
St Paul	58.04	1,384	1,135	19.55
Stafford	206.46	2,649	2,172	10.52
Stanley Zone	68.95	25,319	20,762	301.11
Stockton	258.86	2,882	2,363	9.13
Sublette	232.59	3,583	2,938	12.63
Tecumseh Zone	41.70	6,257	5,131	123.04
Tonganoxie	87.87	10,531	8,635	98.27
Topeka Zone	80.40	145,427	119,250	1,483.21
Towanda	25.22	1,945	1,595	63.24
Treece OK	11.07	320	262	23.70
Valley Center Zone	42.80	10,033	8,227	192.22
Washington	116.80	2,165	1,775	15.20
Wellington	151.29	11,548	9,469	62.59
West Topeka Zone	209.00	7,334	6,014	28.77
Whitewater Zone	130.74	7,020	5,756	44.03
Wichita Zone	132.71	304,858	249,984	1,883.68
Williamsburg	88.87	1,785	1,464	16.47
Winfield	245.88	19,754	16,198	65.88
Yates Center	216.99	2,851	2,338	10.77
	29116.09		1,992,758	68.44

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Without Metro Areas	26688.72		1,009,732	37.83
TRI-COUNTY TEL ASSN.				
Buckeye	74.79	1,259	1,032	13.80
Carlton	93.63	1,454	1,192	12.73
Delavan	64.66	315	258	3.99
Dunlap	45.11	910	746	16.54
Dwight	76.25	1,247	1,023	13.41
Hope	72.66	1,587	1,301	17.91
Lincolnvile	92.79	2,004	1,643	17.71
Lost Springs	87.36	1,203	986	11.29
Navarre	145.34	2,201	1,805	12.42
Ramona	99.74	1,754	1,438	14.42
White City	135.46	1,393	1,142	8.43
Wilsey	96.36	472	387	4.02
Woodbine	96.90	1,497	1,228	12.67
	1181.05		14,183	12.01
TOTAH COMMUNICATIONS				
Elgin	26.62	231	189	7.12
Elk City	121.22	1,906	1,563	12.89
Havana	96.64	1,387	1,137	11.77
Hewins	25.94	70	57	2.21
Liberty	27.30	666	546	20.00
Tyro	86.71	3,044	2,496	28.79
	384.43		5,989	15.58
TWIN VALLEY TEL. INC.				
Aurora	85.73	801	657	7.66
Barnard	89.24	377	309	3.46
Bennington	192.71	2,668	2,188	11.35
Beverly	116.39	554	454	3.90
Clifton	6.84	28	23	3.36
Clifton	85.98	1,578	1,294	15.05
Clyde	101.49	1,990	1,632	16.08
Delphos	100.91	980	804	7.96
Glasco	101.74	2,045	1,677	16.48
Green	155.34	3,339	2,738	17.63
Greenleaf	86.95	1,229	1,008	11.59
Leonardville	116.45	5,615	4,604	39.54
Longford	282.85	2,699	2,213	7.82
Milford	62.27	4,174	3,423	54.97
Miltonvale	167.19	1,583	1,298	7.76
Morganville	80.22	1,600	1,312	16.36
Olsburg	130.78	731	599	4.58
Riley	117.81	3,553	2,913	24.73
Tescott	134.20	1,679	1,377	10.26
Wakefield	111.42	1,789	1,467	13.17
	2326.51		31,990	13.75
UNITED TEL. ASSN.				
Ashland	477.57	1,370	1,123	2.35
Cimarron	411.26	5,482	4,495	10.93
Copeland	215.88	1,161	952	4.41
Englewood	172.70	176	144	0.84
Ensign	103.53	1,154	948	9.14
Ford	184.04	2,917	2,392	13.00
Hanston	171.89	633	519	3.02
Ingalls	289.13	1,640	1,345	4.65
Montezuma	228.27	1,897	1,556	6.81
Spearville	271.94	4,677	3,835	14.10
	2526.21		17,308	6.85
EMBARQ				
Abbyville	132.03	4,535	3,719	28.17
Aiden	155.59	2,074	1,701	10.93

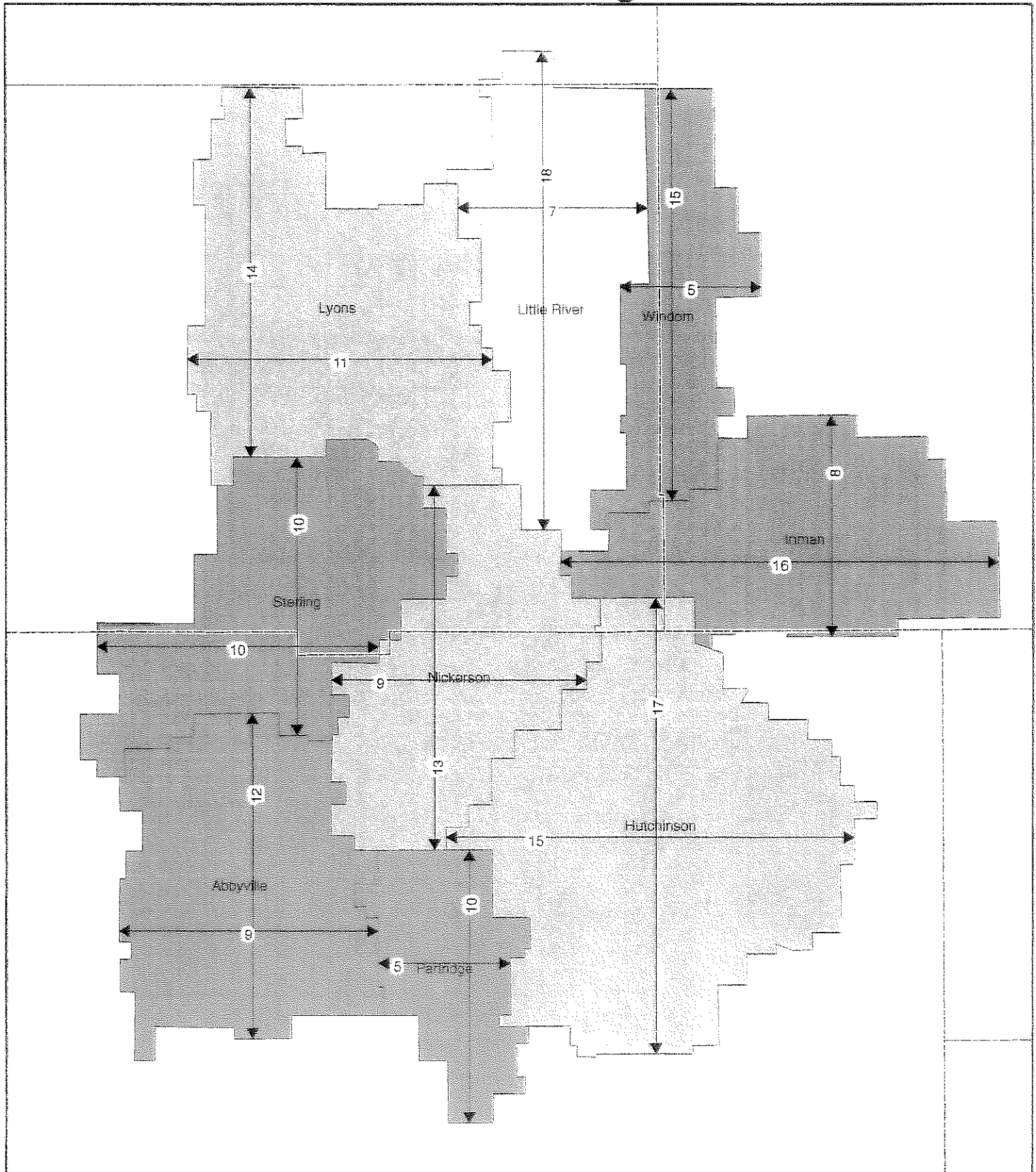
Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Alma	175.73	2,233	1,831	10.42
Alta Vista	174.68	1,894	1,553	8.89
Altamont	74.41	2,571	2,108	28.33
Altoona	56.26	1,407	1,154	20.51
Arlington	81.52	3,001	2,461	30.19
Baldwin City	93.85	10,732	8,800	93.77
Baxter Springs	42.02	6,191	5,077	120.81
Belle Plaine	68.63	4,162	3,413	49.73
Belpre	90.11	804	659	7.32
Benedict	59.60	929	762	12.78
Blue Mound	81.03	1,207	990	12.21
Bucyrus	36.66	2,613	2,143	58.45
Buffalo	90.77	1,525	1,251	13.78
Buhler	68.86	4,099	3,361	48.81
Burlingame	63.13	2,361	1,936	30.67
Burlington	200.61	4,627	3,794	18.91
Burton	104.90	2,868	2,352	22.42
Centropolis	28.82	684	561	19.46
Circleville	60.17	1,061	870	14.46
Clafflin	154.24	4,797	3,934	25.50
Conway	50.26	1,737	1,424	28.34
Coyville	56.24	909	745	13.25
Cunningham	108.69	1,402	1,150	10.58
Delia	77.42	1,364	1,118	14.45
Denison	41.67	1,183	970	23.28
Durham	97.71	1,324	1,086	11.11
Easton	92.17	5,083	4,168	45.22
Edgerton	43.84	8,360	6,855	156.37
Effingham	62.21	2,119	1,738	27.93
Ellinwood	143.74	3,837	2,982	20.75
Emmett	67.97	1,297	1,064	15.65
Eskridge	93.28	1,698	1,392	14.93
Fall River	127.22	849	696	5.47
Fontana	94.61	2,749	2,254	23.83
Fredonia	136.91	4,952	4,061	29.66
Galena	27.59	5,078	4,164	150.92
Gardner	81.89	13,969	11,455	139.88
Garnett	175.51	4,901	4,019	22.90
Greeley	48.92	1,053	863	17.65
Gridley	126.54	946	776	6.13
Harveyville	93.81	2,399	1,967	20.97
Haven	95.71	2,744	2,250	23.51
Hesston	47.76	2,372	1,945	40.73
Hiawatha	131.84	4,937	4,048	30.71
Highland	69.51	1,771	1,452	20.89
Hillsboro	114.06	3,077	2,523	22.12
Hoisington	196.92	7,409	6,075	30.85
Holton	132.94	4,968	4,074	30.64
Horton	41.26	3,278	2,688	65.15
Hoyt	53.14	2,402	1,970	37.07
Hudson	118.39	843	691	5.84
Inman	118.29	2,933	2,405	20.33
Junction City	326.98	55,403	45,430	138.94
Kincaid	112.83	1,914	1,569	13.91
LaFontaine	86.73	1,245	1,021	11.77
Lancaster	31.48	924	758	24.07
Lane	62.60	1,628	1,335	21.33
Langdon	70.46	873	716	10.16
Lebo	176.61	2,604	2,135	12.09
Lehigh	44.04	814	667	15.16
LeRoy	74.00	1,174	963	13.01
Linwood	30.04	3,743	3,069	102.17
Lyndon	90.09	3,258	2,672	29.65
Macksville	195.21	1,629	1,336	6.84
Mapleton	57.27	1,387	1,137	19.86
Mayetta	89.04	2,145	1,759	19.75
McLouth	67.21	3,187	2,613	38.88

Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Melvern	61.00	1,341	1,100	18.03
Meriden	77.82	4,582	3,757	48.28
Michigan Valley	38.82	864	708	18.25
Moran	53.24	1,606	1,317	24.74
Morrill	57.49	960	787	13.69
Mound City	123.79	2,325	1,907	15.40
Mound Valley	81.54	2,688	2,204	27.03
Murdock	122.44	1,303	1,068	8.73
Neosho Falls	56.56	773	634	11.21
Nortonville	86.88	2,070	1,697	19.54
Osage City	178.60	5,005	4,104	22.98
Osawatomie	67.01	6,396	5,245	78.27
Oskaloosa	73.76	2,519	2,066	28.00
Oswego	79.12	4,950	4,059	51.30
Overbrook	113.82	2,800	2,296	20.17
Oxford	92.78	3,453	2,831	30.52
Ozawkie	41.10	2,598	2,130	51.83
Parker	165.59	2,186	1,793	10.83
Partridge	57.27	2,659	2,180	38.07
Perry	59.98	2,452	2,011	33.52
Piqua	31.28	414	339	10.85
Pomona	56.87	2,042	1,674	29.44
Powhattan	55.79	1,418	1,163	20.84
Preston	107.03	1,438	1,179	11.02
Pretty Prairie	196.89	5,560	5,379	27.32
Princeton	46.61	1,744	1,430	30.68
Quenemo	36.17	1,020	836	23.12
Quincy	71.66	287	235	3.28
Richmond	87.56	2,001	1,641	18.74
Riverton	24.00	2,158	1,770	73.73
Rossville	53.91	3,339	2,738	50.79
Scammon	19.15	1,579	1,295	67.61
Silver Lake	61.65	4,732	3,880	62.94
Spring Hill	65.46	9,172	7,521	114.90
St John	220.84	2,465	2,021	9.15
St Marys	70.04	3,456	2,834	40.46
Sterling	126.48	5,259	4,312	34.10
Sylvia	97.35	2,693	2,208	22.68
Thayer	123.46	2,512	2,060	16.68
Toronto	122.84	1,260	1,033	8.41
Troy	103.32	3,290	2,698	26.11
Valley Falls	111.39	3,266	2,678	24.04
Walton	34.45	820	672	19.52
Wathena	77.81	2,887	2,367	30.42
Waverly	116.35	1,935	1,587	13.64
Wellsville	110.25	6,001	4,921	44.63
Westphalia	134.32	1,406	1,153	8.58
White Cloud	45.90	964	790	17.22
Winchester	60.42	2,284	1,873	31.00
Windom	73.42	1,792	1,469	20.01
	10807.51		316,331	29.27
WHEAT STATE TEL. CO.				
Cassoday	169.19	1,702	1,396	8.25
Matfield Green	98.49	279	229	2.32
Olpe	104.31	2,014	1,651	15.83
Potwin	124.03	5,801	4,757	38.35
Rock	47.45	1,235	1,013	21.34
Udall	65.36	2,225	1,825	27.91
	608.83		10,870	17.85
WILSON TEL. CO.				
Brookville	146.16	1,581	1,296	8.87
Denmark	51.91	166	136	2.62
Hunter	164.99	536	440	2.66
Lucas	167.67	1,222	1,002	5.98




Service Area (Exchange)	SQUARE MILES	POPULATION	Corrected Population Estimate	Pop Density/Sq. Mile
Sylvan Grove	142.09	756	620	4.36
Tipton	125.64	1,107	908	7.22
Wilson	176.83	1,916	1,571	8.88
	<u>975.29</u>		<u>5,973</u>	<u>6.12</u>
WAMEGO TELECOMMUNICATIONS CO. INC.				
Paxico	105.44	1,350	1,107	10.50
St George	49.46	2,562	2,101	42.48
Warrego	218.07	7,789	6,387	29.29
	<u>372.97</u>		<u>9,595</u>	<u>25.73</u>
ZENDA TEL. CO. INC.				
Zenda	112.37	692	567	5.05
Rural Incumbents and Embargo	51519.19		702638.32	13.64
ALLTEL AT&T Service Areas	21909.59		666,848	30.44
RCC AT&T Service Areas	9325.51		182,996	19.62
SPRINT AT&T Service Areas	2242.90		1,125,514	501.81
USCOC AT&T Service Areas	9818.29		402,602	41.01

Rebuttal Exhibit JB-3

Nickerson Exchange Area



Exchange

-  25 MUTUAL TELEPHONE COMPANY
-  36 SOUTHWESTERN BELL TELEPHONE CO.
-  42 UNITED TELEPHONE CO. OF KANSAS

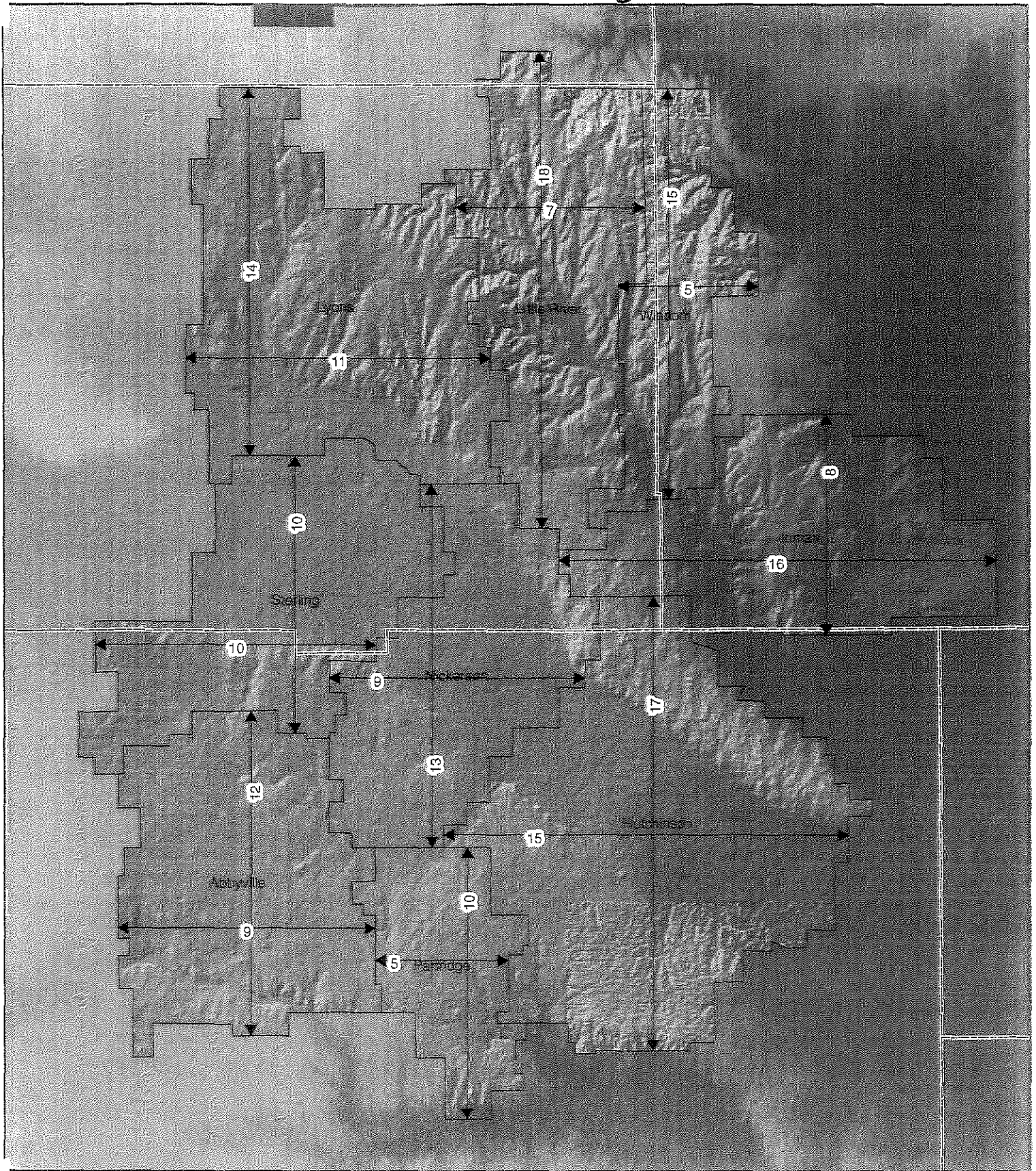
Distance (Miles)



KANSAS
CORPORATION
COMMISSION

14 May 2007

Nickerson Exchange Area



Elevation (meters) Exchange
 High - 1370 Distance (miles)



KANSAS
 CORPORATION
 COMMISSION
 14 May 2007

